

EXHIBIT A

Eric@EJOlsonLaw.com

From: Jeffrey Dulberg <jdulberg@pszjlaw.com>
Sent: Friday, January 17, 2025 4:51 PM
To: eric@ejolsonlaw.com
Cc: les.kleinlaw@gmail.com; leskleinlaw@gmail.com; Bradley Sharp; John W. Lucas
Subject: Re: Klein / June St Turnover

Mr. Olson,

It took well more than that time to finalize our filing, including putting my exhibit together. It was already filed from our end when your email came in. And even if that were not the case, your email is only a promise to do something that you have yet to do as we write each other now.

Both you and the Debtor have had plenty of time and opportunity to make a proposal to the Trustee. Mr. Klein chose instead, without so much as an email or a phone call, to file his appeal.

The Debtor has consistently shown disregard for the Court and his estate with little interest in acting in the best interest of Mr. Klein's creditors.

Your client has not shown sufficient good faith in this case for anyone to rely upon your email saying that a proposal will be forthcoming.

We are open to your suggestions while the turnover motion is pending but we are not changing anything based upon the suggestions you've made today.

Jeff

On Jan 17, 2025, at 4:25 PM, eric@ejolsonlaw.com wrote:

Mr. Dulberg, I discovered that despite my sending you the attached email at 3:22 in response to your email received 3:12, I received your motion filed at 3:48 which indicated that I had not responded at all.

Eric J Olson

Eric J Olson
EJOlsonLaw
301 E. Colorado Blvd, Ste 520
Pasadena, CA 91101
T: (818) 245-2246
C: (626) 224-5619
Eric@EJOlsonLaw.com

From: eric@EJOlsonLaw.com <eric@EJOlsonLaw.com>
Sent: Friday, January 17, 2025 3:32 PM

To: 'Jeffrey Dulberg' <jdulberg@pszilaw.com>; les.kleinlaw@gmail.com; leskleinlaw@gmail.com
Cc: 'Bradley Sharp' <bsharp@DSIConsulting.com>; 'John W. Lucas' <jlucas@pszilaw.com>
Subject: RE: Klein / June St Turnover

Mr. Dulberg, I have been asked to draft a response to your demand. I hope to have it out first thing next week.

Eric J Olson

Eric J Olson
EJOlsonLaw
301 E. Colorado Blvd, Ste 520
Pasadena, CA 91101
T: (818) 245-2246
C: (626) 224-5619
Eric@EJOlsonLaw.com

From: Jeffrey Dulberg <jdulberg@pszilaw.com>
Sent: Friday, January 17, 2025 3:12 PM
To: Eric J. Olson <Eric@ejolsonlaw.com>; les.kleinlaw@gmail.com; leskleinlaw@gmail.com
Cc: Bradley Sharp <bsharp@DSIConsulting.com>; John W. Lucas <jlucas@pszilaw.com>
Subject: RE: Klein / June St Turnover

Messrs. Olson & Klein:

I am confirming that I have not received a response from you with respect to the Trustee's turnover demand below. The Trustee will proceed accordingly.

Best,

Jeffrey Dulberg
Pachulski Stang Ziehl & Jones LLP
Tel: 310.277.6910 | Fax: 310.201.0760
jdulberg@pszilaw.com
[vCard](#) | [Bio](#) | [LinkedIn](#)

<image001.jpg>

Los Angeles | San Francisco | Wilmington, DE | New York | Houston

From: Jeffrey Dulberg
Sent: Wednesday, January 15, 2025 10:19 AM
To: Eric J. Olson <Eric@ejolsonlaw.com>; les.kleinlaw@gmail.com; leskleinlaw@gmail.com
Cc: Bradley Sharp <bsharp@DSIConsulting.com>; John W. Lucas <jlucas@pszilaw.com>
Subject: Klein / June St Turnover

Messrs. Olson & Klein:

As you know, the Trustee prevailed in the June St adversary proceeding and Mr. Klein's bankruptcy estate is now the lawful owner of 100% of the property. I am writing to begin the process of turning over control of the property to Mr. Sharp. Please contact me at your earliest opportunity to discuss the turnover. We would prefer not to have to spend more of the estate's funds to obtain control of the property so please contact me at once.

Best,

Jeffrey Dulberg

Pachulski Stang Ziehl & Jones LLP

Tel: 310.277.6910 | Fax: 310.201.0760

jdulberg@pszilaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

<image001.jpg>

Los Angeles | New York | Wilmington, DE | Houston | San Francisco